

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

Screen Media Ventures, LLC
Plaintiff,

Case No.: 2:13-cv-845

v.

Judge: Edmund A. Sargus, Jr.

DOES 1 - 48
Defendants.

Magistrate Judge: Kemp

**Plaintiff's Motion for an Additional Ten (10) Days' Time
to Respond to Order (Doc# 4)**

Plaintiff Screen Media Ventures, LLC, for the reasons expressed herein, respectfully requests that this Court grant Plaintiff an additional ten (10) days to respond to the Order (Doc# 4) to demonstrate Plaintiff's standing to pursue the copyright claims as presented in the Complaint.

As this Court correctly expressed in its Order (Doc #4), 17 U.S.C §501(b) permits the legal or beneficial owner of an exclusive right to institute an action for any infringement of that particular right. Plaintiff submits, that despite any noted ambiguity in the exhibits attached to the Complaint, that Plaintiff Screen Media Ventures, LLC is in fact a legal or beneficial owner of the exclusive right to distribute copies of the copyrighted Motion Picture to the public. In addition, Plaintiff has the subdivided exclusive right to enforce the distribution rights therein, including the exclusive right to file claims for copyright infringement including claims for wrongful copying or distribution by way of a bit torrent application or other file sharing or internet downloading, copying or distribution.

The undersigned has been working actively with representatives of Plaintiff Screen Media Ventures, LLC to obtain documentation that will indisputably establish its

standing pursuant to 17 U.S.C. §501(b). Plaintiff's representatives have been responsive; however, the key authorized representatives of the Plaintiff have been traveling overseas and have not been able to execute and provide such documentation within the fourteen day timeline established by the Court for Plaintiff to file its response.

For these reasons, Plaintiff respectfully requests an additional ten (10) days to show cause as ordered by the Court in its Order (Doc# 4). In the event that Plaintiff is unable to provide adequate documentation within that time period, it will voluntarily dismiss this action.

Respectfully submitted,

/s/ Leon D. Bass

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